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Attorneys for Defendants  
SUSAN PACINI and  
MASTER MARKETEERS, INC.

THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

CHANEL, INC., a New York corporation,  
  
Plaintiff,

v.

SUSAN LYNNE PACINI a/k/a SUSAN L.  
PACINI d/b/a PLANET TAN d/b/A MASTER  
MARKETEERS, INC.,

Defendants.

Case No. C-07-5946-CRB

**STIPULATION AND [PROPOSED]  
ORDER GRANTING PLAINTIFF  
CHANEL, INC. LEAVE TO FILE FIRST  
AMENDED COMPLAINT**

Honorable Charles R. Breyer  
Courtroom: 8, 19th Floor

Pursuant to Civil Local Rule 7-12, plaintiff Chanel, Inc. ("Chanel") and defendants Susan L. Pacini and Master Marketeers, Inc., (collectively "Defendants") stipulate as follows and respectfully request that the Court enter the following Proposed Order:

1 WHEREAS on or about November 26, 2007, Chanel filed its original Complaint in this  
2 action naming Susan Pacini as the sole defendant, “doing business as” a variety of entities;

3 WHEREAS on December 24, 2007, defendant Susan Pacini was served;

4 WHEREAS on April 7, 2008, Master Marketeers, Inc., filed an Answer to Chanel’s  
5 Complaint;

6 WHEREAS Chanel’s Complaint against Susan Pacini did not include Master Marketeers,  
7 Inc. as a named defendant;

8 WHEREAS, it is the position of defendants that Master Marketeers, Inc. was named as a  
9 defendant and an amendment is only needed to avoid any potential dispute in this regard;

10 WHEREAS, the parties have agreed that Plaintiff may amend the Complaint to name Master  
11 Marketeers, Inc. as a defendant in this case;

12 WHEREAS, although Master Marketeers, Inc. has already answered, counsel for defendants  
13 is willing to stipulate to the filing of the First Amended Complaint on behalf of Chanel, Inc.;

14 **IT IS HEREBY STIPULATED AND AGREED THAT**, subject to Court approval, Chanel  
15 shall file the First Amended Complaint naming Master Marketeers, Inc. as a defendant, a copy of  
16 which is attached as Exhibit A; and

17 **IT IS FURTHER STIPULATED AND AGREED THAT** Defendants Pacini and Mass  
18 Marketers, Inc. shall have ten days from the filing of the First Amended Complaint within which to  
19 file their Answer(s).

20 **IT IS SO STIPULATED AND AGREED,**

21  
22 Dated: June 11, 2008

KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP

23  
24 By: \_\_\_\_\_/s/\_\_\_\_\_

25 MICHAEL D. LISI  
26 Attorneys for Plaintiff  
27 CHANEL, INC.  
28

1 Dated: June 11, 2008

TINGLEY PIOTKOWSK LLP

2  
3 By: \_\_\_\_\_/s/

BRUCE PIONTKOWSKI

4 Attorney for Defendants SUSAN PACINI

5 & MASTER MARKETTERS, INC.

6 I hereby attest that I have been authorized by Bruce Piontkowski to execute on his behalf this  
7 Stipulation and [Proposed] Order Permitting Electronic/Computer Equipment into Federal  
8 Courtroom.

9 Executed on this 11<sup>th</sup> day of June, 2008, at San Francisco, California.

10 \_\_\_\_\_/s/

11 Michael D. Lisi

**[PROPOSED] ORDER**

Pursuant to the parties' stipulation, Plaintiff is granted leave to amend its Complaint to add Master Marketeters, Inc. as a defendant to this litigation, as indicated in the First Amended Complaint attached to the parties' Stipulation.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2008

\_\_\_\_\_  
Hon. Charles R. Breyer  
U.S. District Court Judge